

AO 187 (Rev. 7/87) Exhibit and Witness List

## UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

FLORIDA

USA

## EXHIBIT AND WITNESS LIST

V.

Patrick Boyd Charles Boyd

Case Number: 24-cr-20255-WPD

PRESIDING JUDGE					PLAINTIFF'S ATTORNEY		DEFENDANT'S ATTORNEY	
William P. Dimitrouleas					J DerOvanesian, A. Pogozelski		W. Barzee, B. Zimet	
TRIAL DATE(S)					COURT REPORTER		COURTROOM DEPUTY	
9/17, 18, 19, 22, 25, 29, 30, 10/6					S. Kelley, P. Bailey Entin		Crystal Barnes-Butler	
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES			
1		9/18			Kathleen Eberspacher			
2		"			Jonathan Nicholls			
3		9/19			Lisa Trissell			
4		"			CUSTAVO BORJA			
5		"			Abigail Divilio			
6		9/25			Martha Rumore			
		9/29			"			
		9/30			"			
7		"			Vipulbhai Parekh			
8		10/6			Eddie Calienes			
		10/7			"			
9		10/7			Nicole Woofe			
10		10/7			Peter Khaim			
		10/8			"			
11		10/20			DANIEL Conger			
12		10/20			Peter Khaim Recall			
13		"			Abigail Divilio Recall			
		10/21			"			
		10/22			"			
		10/23			"			
					see attached exhibit lists			

\* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-CR-20255-DIMITROULEAS**

**UNITED STATES OF AMERICA**

**vs.**

**PARTICK BOYD  
and CHARLES BOYD,**

**Defendant.**

**GOVERNMENT'S EXHIBIT LIST**

Presiding Judge: <b>The Honorable William P. Dimitrouleas</b>	Government Prosecutors: <b>Alexander Thor Pogozelski Jacqueline DerOvanesian</b>	Defense Attorneys: <b>Bruce Zimet William Barzee Ivlis Mantilla</b>
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<b>Exhibit Number</b>	<b>Date Identified</b>	<b>Date Admitted</b>	<b>Objections/ Stipulated Admissions</b>	<b>Description of Exhibit</b>
<b><u>001s – Counts</u></b>				
1				Count 1 OA1 - 2020.05.22 Teams from Adam Brosius to Charles Boyd re 'our numbers are gonna be 1 mil+' - SCSRELATIVITY 0000435667
2		10/6		Count 1 OA2 - 2020.07.08 Teams from Patrick Boyd to Adam Brosius re 'hours counting hiv with the crew' - SCSRELATIVITY 0000769223
3				Count 1 OA3 - 2020.07.24 312k Wire Transfer from Univest x9807 Safe Chain LLC to Boulevard - SCS-0000143840
3Z				Count 1 OA3 Demonstrative - 2020.07.24 312k Wire Transfer from Univest x9807 Safe Chain LLC to Boulevard - SCS-0000143840
4		10/6		Count 1 OA4-7 - 2020.08.14 Text Patrick Boyd and Charles Boyd re 'opened a bottle and it was a different med' - SCSRELATIVITY 0001557545

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
5				Count 1 OA8 - 2020.08.18 1.2mil Wire Transfer from Univest x9807 Safe Chain LLC7 to Gentek - SCS-0000143817
5Z				Count 1 OA8 Demonstrative - 2020.08.18 1.2mil Wire Transfer from Univest x9807 Safe Chain LLC7 to Gentek - SCS-0000143817
6				Count 1 OA9 - 2020.09.29 Email from Patrick Boyd to Adam Brosius re BLVD falsified T3s - SCSRELATIVITY 0001340189-192
7				Count 1 OA10 - 2020.09.30 Email from Abigail Divilio to Charles Boyd and Patrick Boyd FW Biktarvy and Complera - SCSRELATIVITY 0001349930
8				Count 1 OA11 - 2020.10.12 Email from Abigail Divilio to Charles Boyd and Patrick FW Gilead Sciences Biktarvy - SCSRELATIVITY 0001334175
9				Count 1 OA12 - 2020.10.23 200k Wire Transfer from Univest x9807 Safe Chain LLC to Boulevard - SCS-0000143784-85
9Z				Count 1 OA12 Demonstrative - 2020.10.23 200k Wire Transfer from Univest x9807 Safe Chain LLC to Boulevard - SCS-0000143784-85
10				Count 1 OA15 - 2021.03.26 700k Wire Transfer from Univest x9807 Safe Chain LLC to Boulevard - SCS-0000144066
10Z				Count 1 OA15 Demonstrative - 2021.03.26 700k Wire Transfer from Univest x9807 Safe Chain LLC to Boulevard - SCS-0000144066
11				Count 1 OA16 - 2021.04.30 1.1mil Wire Transfer from Univest x9807 Safe Chain LLC to Synergy - SCS-0000144053-54
11Z				Count 1 OA16 Demonstrative - 2021.04.30 1.1mil Wire Transfer from Univest x9807 Safe Chain LLC to Synergy - SCS-0000144053-54
12				Count 1 OA17 - 2021.07.07 527k Wire Transfer from Univest x9807 Safe Chain LLC to Omom Pharmaceuticals - SCS-0000144013-14
12Z				Count 1 OA17 Demonstrative - 2021.07.07 527k Wire Transfer from Univest x9807 Safe Chain LLC to Omom Pharmaceuticals - SCS-0000144013-14
13		10/16		Count 2 - 2021.01.21 Safe Chain Shipment to Pharmacy 1 Invoice - SCSRELATIVITY 0001424549-50

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
14		10/6		Count 2 - 2021.01.21 Safe Chain Shipping Confirmation to Pharmacy 1 - SCSRELATIVITY 0001424354
15		10/6		Count 2 - 2021.01.21 Safe Chain T3-Pedigree for Pharmacy 1 - SCSRELATIVITY 0001335903
16		10/6		Count 3 - 2021.02.23 Safe Chain T3-Pedigree for Pharmacy 2 - SCSRELATIVITY 0001427973
17		10/6		Count 3 - 2021.02.23 Shipment of Biktarvy to Pharmacy 2 Invoice - SCSRELATIVITY 0001423800-01
18		10/6		Count 3 - 2021.02.23 Shipment of Biktarvy to Pharmacy 2 Shipping Confirmation - SCSRELATIVITY 0001425611
19		10/20		Count 6 - 2020.08.06 400k Wire Transfer from World Wide Pharma JPMC x5196 to Gentek Citizens x4795 - SCS-0000073164, SCS-00000000231
19Z				Count 6 Demonstrative - 2020.08.06 400k Wire Transfer from World Wide Pharma JPMC x5196 to Gentek Citizens x4795 - SCS-0000073164, SCS-00000000231
20		10/6		Count 7 - 2020.10.30 Teams from Adam Brosius to Patrick Boyd and Charles Boyd - SCSRELATIVITY 0000755484
21		10/6		Count 8 - 2021.04.13 Email from Safe Chain to Pharmacy 1 LLC re T3s - SCSRELATIVITY 0001393753-802
<b>030s – Physical Exhibits</b>				
30		9/19		Two bottles of Biktarvy (Lot CCZCBA)
31				Two bottles of Biktarvy (Lot CCXKVA)
32				Two bottles of Descovy (LOT 019815)
33				Counterfeit Biktarvy patient leaflet
34				Counterfeit Genvoya patient leaflet
35				Counterfeit Stribild patient leaflet
36				Counterfeit Vosevi patient leaflet
<b>040s Summary Exhibits</b>				
40		10/20		Financial Summary Exhibits
40A		11		Safe Chain Summary of Payments to HIV Suppliers
40B		11		Safe Chain Time Period of Payments to HIV Suppliers
40C		11		Safe Chain Payments to Boulevard 9229, LLC
40D		11		Safe Chain Summary of Payments to Boulevard 9229, LLC
40E		11		Safe Chain Payment Details to Boulevard 9229, LLC
40F		11		Safe Chain Summary of Payments to Gentek, LLC
40G		11		Safe Chain Payment Details to Gentek, LLC
40H		11		Safe Chain Payment Details to Rapid's Tex via Mr. Unlimited, LLC
40I		11		Safe Chain Summary of Payments to Synergy Group Wholesalers, LLC

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
40J		10/20		Safe Chain Payment Details to Synergy Group Wholesalers, LLC
40K		11		Safe Chain Payment Details to Omom Pharmaceuticals, LLC
40L		11		Safe Chain Total Revenue and Payments to HIV Suppliers
41		10/16		Call Records Summary Exhibits
41A		11		Calls Summary - Charles Boyd and Peter Khaim
41B		11		Calls Summary - Charles Boyd, Adam Brosius, Potentially Peter Khaim
41C		11		Calls Summary - Charles Boyd and Edel Reyes
41D		11		Calls Summary - Charles Boyd, Adam Brosius, Potentially Edel Reyes
41E		11		Billing Toll Explanation Sheet
<b>050s Certified Drivers Licenses and Corporate Records</b>				
50				Abigail Divilio Certified Driver's License - SCS-0000156214-25
51				Carlos Vega Certified Driver's License - SCS-0000153220-321
52				Charles Boyd Certified Driver's License - SCS-0000156206-8
53				Courtney Coleman Certified Driver's License - SCS-0000156208-13
54				Dhruv Ralhan Certified Driver's License - SCS-0000153024-125
55				Edel Reyes-Frontela Certified Driver's License - SCS-0000153126-99
56				Garrett Mellott Certified Driver's License - SCS-0000156197-26
57				Jenna Devuyt Certified Driver's License - SCS-0000156193-97
58				Jonathan Nicholls Certified Driver's License - SCS0000156216-19
59				Patrick Boyd Certified Driver's License - SCS0000156219-20
60				Cintex Services LLC - Delaware 2012.01.30 Registration - SCS-0000156183
61				Cintex Services LLC - Georgia 2019.01.23 Registration - SCS0000156184
62				Cintex Services LLC Certified Corporate Records - SCS0000156185-92
63				OMOM Pharmaceuticals Inc. Certified Corporate Records - SCS-0000153020-23

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
64				Safeway Distributors Inc. Certified Corporate Records - SCS-0000153200-19
65				Worldwide Pharma Sales Group Inc. Certified Corporate Records - SCS-0000153322-29
<b>070s Videos</b>				
70		10/16		Charles Boyd Deposition - 10.11.18 - 10.13.48
71		10/16		Patrick Boyd Deposition - 11.39.54 - 11.40.06
72		10/16		Patrick Boyd Deposition - 11.57.00 - 11.59.01
73		10/16		Patrick Boyd Deposition - 18.17.50 - 18.18.37
74		10/16		Charles Boyd Deposition - 10.05.48 - 10.08.17
75				Charles Boyd Car Accident Video 1
76				Charles Boyd Car Accident Video 2
77				Charles Boyd Car Accident Video 3
78				Charles Boyd Car Accident Video 4
79				Patrick Boyd Deposition - 12.35.13-12.35.53
80		10/16		Charles Boyd Deposition - 09.41.43 - 09.42.09
81		10/16		Charles Boyd Deposition - 11.07.05 - 11.07.38
82				Charles Boyd Deposition - 12.21.12 - 12.21.22
83		10/16		Charles Boyd Deposition - 12.22.42 - 12.22.52
84				Charles Boyd Deposition - 14.51.57 - 14.52.47
<b>080s Pedigree T3s</b>				
85		9/19		Excerpts of Boulevard T3s - SCSRELATIVITY 0001543891-1550902
86		9/25/20		Excerpts of Boulevard T3s - SCSRELATIVITY 0001321911-1427772
87		9/25/20		Excerpts of Boulevard T3s - SCSRELATIVITY 0001321264-1322006
88		9/25/20		Excerpts of Boulevard T3s - SCSRELATIVITY 0001544806-1550925
89		9/25/20		Excerpts of Boulevard T3s - SCSRELATIVITY 0001320837-1451383
90		10/16		Gentek LLC T3s (January 2021) - SCSRELATIVITY 0001546249-1550697
91		10/16		Excerpts of ViiV T3s - WWPB001394-CTRL00042227
92		10/16		Excerpts of Synergy T3s - SCSRELATIVITY 0001320859
93		10/16		Gentek Janssen T3 - SCSRELATIVITY 0001339140
94		10/16		Janssen Synergy T3s - SCSRELATIVITY 0001320824
95		10/16		Rapids Tex - MR Unlimited Janssen T3 - SCSRELATIVITY 0001322169
96		10/16		Excerpts of Boulevard T3s - SCSRELATIVITY_0001320825

97  
9810/21  
10/16

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
<b>100s-300s Emails</b>				
100				2015.07.16 Email to JH PB re customer request for DCSA info - SCSRELATIVITY 0001326970
101		9/18		2015.09.08 Email from Jesse Hammett to Katie Eberspacher requesting info on SC T3 policy - SCSRELATIVITY 0001326066
102		10/6		2015.09.29 Email from JHammet to CBoyd PBoyd re SCS Pedigree program and CBoyd sending SOP manual - SCSRELATIVITY 0001328181-82
103		10/6		2016.01.05 Email from PR to PB and others re discounted HIV drugs - SCSRELATIVITY 0001325772-73
104		10/6		2016.03.31 Email from PB to PR re HIV Master List with 30% Margin' - SCSRELATIVITY 0001327713-14
104A				2016.03.31 Email from PB to PR re HIV Master List with 30% Margin' - SCSRELATIVITY 0001327714 Attachment
105				2016.04.01 Email from Patrick Boyd to Brett Eggleston re emailing peds to PB - SCSRELATIVITY 0001327024-26
106				2018.04.30 Email from Courtney Ruark to Orders re Eclipse returning meds for no approved vendor on T3 - SCSRELATIVITY 0001453451
107		9/18		2018.07.05 Email from Katie Eberspacher to Charles Boyd re Gray Wholesalers Article - SCSRELATIVITY 0001325438
108		10/6		2018.07.05 Email from Pat Boyd to Anthony Berger FWD Gray Wholesalers Article - CTRL00465399
109		10/6		2018.10.05 Email from Bill Carrieri to Charles Boyd - NPPA Elevator Speech - SCSRELATIVITY 0001420626
110				2018.10.17 Email from CBoyd to Divilio attaching SOPs for suspect prod t3 docs trading partner validation - SCSRELATIVITY 0001333798-802
111		9/19		2020.04.22 Email from KN to Compliance re BLVD vendor app - SCSRELATIVITY 0001430372
111A		10/7		BLVD vendor app, W9, and license - SCSRELATIVITY 0001430373-75
112		10/8		2020.04.27 Email from Ishbay Shukurov to Invoices attaching invoice for 200 Truvada - SCSRELATIVITY 0001444974
113				2020.05.23 Email from AB to CB PB AB HIV sales - SCSRELATIVITY 0001363039
114				2020.05.29 Email from Dhruv Ralhan to Adam Brosius re Albuterol Mix-up - SCSRELATIVITY 0002126258

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
115		10/6		2020.06.12 Email from CS to Invoices re Gentek vendor app - SCSRELATIVITY 0001370131
116		9/25p		2020.06.30 Email from Jesse Hammett to Charles Boyd re Kalorama Damaged Bottle - SCSRELATIVITY 0001365458
117				2020.06.30 Email from JH to CB re damaged bottle of Selzentry - SCSRELATIVITY 0001365458
118		9/18		2020.07.07 Email from Patrick Boyd to Safe Chain re WAC info for team HIV call - SCSRELATIVITY 0001339434
119		9/19		2020.07.10 Email from Abigail Divilio to Adam Brosius et al re Issues with Boulevard T3 - SCSRELATIVITY 0001435161
120				2020.07.08 Email from Abigail Divilio to Jenna Mellott re BLVD Drugs with no T3s - SCSRELATIVITY 0001339204
121				2020.07.09 Email from Abigail Divilio to Jenna Mellott and Compliance re 'BLVD has not provided any T3 info' - SCSRELATIVITY 0001339
122				2020.07.09 Email from AD to JM Garrett MG re boulevard 9229 t3s - SCSRELATIVITY 0001339363
123		10/6		2020.07.09 Email from Brosius to Sales Team & Pat Boyd re WW success at WAC-6.5 - CTRL00041219
124		9/19		2020.07.10 Email from AD to CB and AB re need them to comply with the DSCSA - SCSRELATIVITY 0001339094
125		10/6		2020.07.10 Email from AD to MZ AB re boulevard 9229 t3s - SCSRELATIVITY 0001339202
126		10/6		2020.07.13 Email from Patrick Boyd to Jon Weed re need t3 for customer - SCSRELATIVITY 0001380053
127		9/19		2020.07.20 Email from AD to CB and AB re DSCSA Information 'have not heard anything' - SCSRELATIVITY 0001339125
128		10/6		2020.08.05 Email from Adam Brosius to Charles Boyd re 'Need product from BLVD' - SCSRELATIVITY 0001416048
129		10/6		2020.08.06 Email from AB to CB DR fwd customer request - SCSRELATIVITY 0001408934
130		10/6		2020.08.06 Email from Adam Brosius to BLVD re 'T3s are a bit more involved than just an address' - SCSRELATIVITY 0001415195
131		10/10		2020.08.06 Email from Charles Boyd re BLVD T3s - SCSRELATIVITY 0001409845
132		10/6		2020.08.07 Email from CB to invoice RE T3s - SCSRELATIVITY 0001369268

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
133		9/25/24		2020.08.08 Email from Charles Boyd to Adam Brosius et al. re Pedigrees - SCSRELATIVITY 0001409643
134				<i>Intentionally Left Blank</i>
135		10/6		2020.08.10 Email from Charles Boyd to King Kimchi introduction - SCSRELATIVITY 0001371493
135A		10/6		2020.08.10 Email from Charles Boyd to King Kimchi introduction - SCSRELATIVITY 0001371494
136		9/19		2020.08.11 Email from AD to CB re introduction - SCSRELATIVITY 0001435677
136A		9/19		2020.08.11 Email from AD to CB re introduction - SCSRELATIVITY 0001435678
137				2020.08.17 Email from Abbie Divilio to Gilead re Lot number verification - SCSRELATIVITY 0001341274
138				2020.08.17 Email from Abigail Divilio to Patrick Boyd asking him to call Drogueria - SCSRELATIVITY 0001330993
139				2020.08.17 Email from AD to Betances t3 verification - SCSRELATIVITY 0001339170
140				<i>Intentionally Left Blank</i>
141		10/6		2020.08.17 Email from CB to JM et al approving return of CCPDPA - SCSRELATIVITY 0001366585
142				2020.08.17 Email from Charles Boyd note to self re quality control log - DOJ-PPM-0000118951
143				2020.08.17 Email from Kendreas Ferdinand to Jenna Mellott RE WHITE CROSS RETURN - SCSRELATIVITY 0001358675
144				2020.08.18 Email from Abbie Divilio to Charles Boyd Fw Gilead (PR-196084) - SCSRELATIVITY 0001341125
145				2020.08.18 Email from AD to CB JH re t3 verification - SCSRELATIVITY 0001338949
146				2020.08.19 Email from Amanda Biggart to Andrew Leibowitz re May 2020 Bank Rec - DOJ-PPM-0000117722
147				2020.08.19 Email from CB to GM and AB re Biktarvy issue - SCSRELATIVITY 0001361438
148				2020.08.20 Email from Charles Boyd to Adam Brosius re White Cross Biktarvy - SCSRELATIVITY 0001360902
149		10/6		2020.08.21 Email from Charles Boyd to Quality Complaints and Abbie Divilio RE Gilead (PR-196084) - SCSRELATIVITY 0001341278
150				2020.08.21 Email from Compliance to JN re pedigree request - SCSRELATIVITY 0001338207

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
151				2020.08.21 Email from SC to JN RE Pedigree Request - SCSRELATIVITY 0001338852
152		9/25p		2020.08.28 Email from AB to CB, DR comparing BLVD to Gentek photo of bottles - SCSRELATIVITY 0001395945
153				2020.08.31 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree - SCSRELATIVITY 0001338343-44
154				2020.08.31 Email from Jonathan Nicholls to Clint Hopkins FW Last Pedigree - CTRL02314726
155				2020.09.09 Email from Dakota Flowers to Jonathan Nicholls RE HIV Pedigree Request - SCSRELATIVITY 0001341062
156				2020.09.14 Email from compliance to quality complaints CB re Gilead - SCSRELATIVITY 0001341106
157				2020.09.15 Email from JNicholls to Olympia Plaza sending T3s - CTRL02312821-25
158				2020.09.16 Email from DF to JN re Olympia Pharmacy Invoices - SCSRELATIVITY 0001338253
159				2020.09.16 Email from Jonathan Nicholls to Dakota Flowers RE Olympia Pharmacy Invoices - CTRL02311240
160		9/19		2020.09.21 Email from Abigail Divilio to biztransights re Kimchee T3 binder to Charles Boyd - SCSRELATIVITY 0001329974-75
161		10/6		2020.09.23 Email DF to PB attaching Olympia T3s incl BLVD t3s - SCSRELATIVITY 0001426720-24
162		10/6		2020.09.23 Email DF to PBoyd attaching Olympia T3 incl BLVD t3s - SCSRELATIVITY 0001432932-33
163				2020.09.23 Email from Dakota Flowers to Pat Boyd FW HIV Pedigree Request - SCSRELATIVITY 0001341080
164				<i>Intentionally Left Blank</i>
165				2020.09.23 Email from DF to JN re Olympia Pharmacy Invoices - SCSRELATIVITY 0001339990-94
166				2020.09.23 Email from DF to PB FW Olympia Pharmacy Invoices - SCSRELATIVITY 0001338442
167				2020.09.23 Email from PB to AD re Olympia and T3 issues and diff vendor - SCSRELATIVITY 0001349491
168		9/25p		2020.09.23 Email from PB to CB Olympia pedigree issue doesn't sound great - SCSRELATIVITY 0001351735
169				2020.09.24 Email from CB to PB re Market Overview - SCSRELATIVITY 0001405267
170		10/20		2020.09.29 Email from AD to CK Biktarvy and Complera - SCSRELATIVITY 0001427825
171				2020.09.29 Email from AD to PB & CB RE Verification of Blvd T3s - SCSRELATIVITY 0001350318

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
172				2020.09.29 Email from IPC to AD re T3s - SCSRELATIVITY 0001350283
173		9/19		2020.09.29 Email from Patrick Boyd to Adam Brosius re BLVD T3s - SCSRELATIVITY 0001340189-92
174		9/19		2020.09.30 Email from AD to PB and CB FW Biktarvy and Complera - SCSRELATIVITY 0001349930
175				2020.09.30 Email from Sarah Rogers to Abbie Divilio FW Biktarvy and Complera - SCSRELATIVITY_0001349807-09
176		9/25p		2020.10.01 Email from AB to CB Re FW T3s - SCSRELATIVITY 0001369167
177		9/19		2020.10.01 Email from Kimchi to AD re T3 concerns 1 - SCSRELATIVITY 0001333765
178				2020.10.01 Email from Kimchi to AD re T3 concerns 2 - SCSRELATIVITY 0001331206
179		10/6		2020.10.01 Email from Olympia to JN Olympia plaza pharmacy product return - SCSRELATIVITY 0001339380
180		9/19		2020.10.01 Email Kimchi to AD re CDGXKA T3 w Rochester - CTRL00378519-20
181		9/19		2020.10.02 Email from AD to KK CB re NYS professions - online verifications - SCSRELATIVITY 0001428248
182		9/18		2020.10.02 Email from Olympia Plaza to PB AD Re Olympia Plaza Pharmacy product return - SCSRELATIVITY 0001350225
183		9/18		2020.10.03 Email from Olympia Plaza to PB AD Re Olympia Plaza Pharmacy product return - SCSRELATIVITY 0001350114-17
184		9/19		2020.10.05 Email AD to Kimchi CB re Instacare out of business - SCSRELATIVITY 0001332408
185				2020.10.06 Email from Abbie Divilio to Gilead re T3 verification - SCSRELATIVITY_0001331330-31
186		9/19		2020.10.06 Email from King Kimchi to Abigail Divilio, Charles Boyd et al re T3 binder - SCSRELATIVITY_0001329432-33
187		9/19		2020.10.12 Email from Compliance to CB & PB FW Gilead Sciences Biktarvy Inquiry - SCSRELATIVITY 0001334175
188		10/20		2020.10.13 Email from Abigail Divilio to Charles Boyd re FDA Form 3911 - SCSRELATIVITY 0001333983
189				2020.10.13 Email from AD to KK re T3 verifications - SCSRELATIVITY 0001436989

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
190		10/6		2020.10.13 Email from King Kimchi to Abigail Divilio and Charles Boyd re 'it's 100 percent np' - SCSRELATIVITY 0001331555
191		10/8		2020.10.13 Email from KK to AD T3 verifications - SCSRELATIVITY 0001427891
192		10/6		2020.10.14 Email from AD to CB RE MEDICINE SHOPPE #1802 - URGENT - SCSRELATIVITY 0001341281
193				2020.10.14 Email from CB to AD RE MEDICINE SHOPPE #1802 - URGENT - SCSRELATIVITY 0001393714-15
194				2020.10.21 Email from DF to KK re Kimchi T3s - SCSRELATIVITY 0001329075-79
195				2020.10.29 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree - SCSRELATIVITY 0001430856-57
196		9/25p		2020.11.12 Email GMellott to CB PB Brosius re wrong pills inside Symtuza and prod of Canada (w photos) - SCSRELATIVITY 0001339419
197				2020.11.13 Email from JN to DF RE Pedigree Completion #2 - SCSRELATIVITY 0001338906-07
198				2020.11.13 Email from Jonathan Nicholls to Compliance FW Pedigree Completion #2 - SCSRELATIVITY 0001429126-27
199				2020.11.18 Email PB to CB with images re product of Canada (with images) - SCSRELATIVITY 0001339423
200		10/6		2020.11.19 Email Kendreas Ferdinand to Jenna Mellott re Medicine Shop return - SCSRELATIVITY 0001434970
201				2020.11.19 Email PB to CB re bottle says product of Canada - SCSRELATIVITY 0001340792
202				2020.11.20 Email from Dakota Flowers to GM HD re Kimchi T3 Binder - SCSRELATIVITY 0001329561-62
203		9/25		2020.11.24 Email from AD FW sale of counterfeit Biktarvy - SCSRELATIVITY 0001363320-21
204		9/25		2020.11.25 Email from Charles Boyd to Abigail Divilio re attorney email - DOJ-PPM-0000115494
205		9/25		2020.12.04 Email from Friar Levitt to Abigail Divilio and Charles Boyd re Letter attachment and notes - DOJ-PPM-0000115711-12
206		9/25		2020.12.04 Email from Frier Levitt to Abbie Divilio and Charles Boyd re Seroquel - DOJ-PPM-0000118477
207		9/25		2020.12.07 Email from Charles Boyd to Abigail Divilio and Martha Rumore re clarification - DOJ-PPM-0000117320
208		9/25		2020.12.08 Email from MR to CB FW safe chain response to Gilead letter of Nov 23 - DOJ-PPM-0000115703-04

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
209		9/25		2020.12.11 Email from Martha Rumore Abigail Divilio and Charles Boyd CCd re Gilead response to Nov 23rd letter - DOJ-PPM-0000116007-08
210				2020.12.14 Email from Abigail Divilio to Charles Boyd re lots tracking - SCSRELATIVITY 0001341205-07
211				2020.12.14 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree - SCSRELATIVITY 0001431727-28
212				2020.12.15 Email from AB to CB & PB Fwd 2020 year in review and looking forward - SCSRELATIVITY 0001340177
213		10/20		2020.12.16 Email from Abigail Divilio to Charles Boyd re letter to customers - SCSRELATIVITY 00013413338-39
214				2020.12.16 Email from Charles Boyd to Martha Rumore et al FW Biktarvy Issue, White Cross - DOJ-PPM-0000115854-55
215				2020.12.17 Email from AD to CB re revised letter to customers - SCSRELATIVITY 0001341249-50
216				2021.01.04 Email from Martha Rumore to Abbie Divilio & Charles Boyd RE Biktarvy Issue, White Cross - DOJ-PPM-0000116912
217		10/16		2021.01.05 Email from PB to JN AB JW new WAC pricing - SCSRELATIVITY 0001339537-38
218				2021.01.13 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree Completion - SCSRELATIVITY_0001338764-65
219				2021.01.18 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree Completion - SCSRELATIVITY_0001426584-87
220				2021.01.18 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree Completion - SCSRELATIVITY_0001431235-40
221				2021.01.18 Email from DF to JN re pedigree completion - SCSRELATIVITY 0001338311-14
222				2021.01.28 Email from Compliance to Christopher Woo RE CI 2020 90357 White Cross Pharmacy - SCSRELATIVITY 0001322771-74
223				<i>Intentionally Left Blank</i>
224				<i>Intentionally Left Blank</i>
225		9/25		2021.02.05 Email from Charles Boyd to Martha Rumore RE Biktarvy issue with a customer - DOJ-PPM-0000118506
226				2021.02.05 Email from Martha Rumore to Abbie Divilio RE Biktarvy issue with a customer - DOJ-PPM-0000118470

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
227		10/21		2021.02.09 Email from compliance to Martha Rumore FW Biktaryv issue with a customer - DOJ-PPM-0000116257
228				2021.02.09 Email from GM to AB CB re ci 2020 90357 white cross pharmacy - SCSRELATIVITY 0001357654
229				2021.02.10 Email from AD to CB re edits response to Woo - SCSRELATIVITY 0001331358
230				2021.02.10 Email from AD to CB re proposed response to Woo - SCSRELATIVITY 0001331551
231				2021.02.10 Email from Charles Boyd to Abigail Divilio re Gentek contact info - SCSRELATIVITY 0001363674
232				2021.02.10 Email from Compliance to Christopher Woo CB, PB re Safe Chain - SCSRELATIVITY 0001331034
233				2021.02.11 Email from Matha Rumore to Abbie Divilio RE Biktaryv - DOJ-PPM-0000118466
234				2021.02.12 Email from MR to CB AD fwd Gilead product complaint Biktaryv - DOJ-PPM-0000116643-44
235				2021.02.13 Email from MR to CB FW Gilead product complaint Biktaryv - DOJ-PPM-0000115864-67
236				2021.02.18 Email from Abbie Divilio to Quality Complaints et al Biktaryv Pictures - DOJ-PPM-0000116596
237		9/25		2021.02.19 Email from AD to MR CB re Biktaryv lots cczcfa & cdfyca - DOJ-PPM-0000116361-64
238				2021.02.22 Email from MR to CB AD FW safe chain response letter - DOJ-PPM-0000116221-26
239				2021.02.23 Email from Abigail Divilio to Martha Rumore et al re Gilead Lots - DOJ-PPM-0000115653
240				2021.03.02 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree Completion - SCSRELATIVITY_0001338507-09
241				2021.03.02 Email from Dakota Flowers to Jonathan Nicholls RE Pedigree Completion - SCSRELATIVITY_0001436254-56
242				2021.03.02 Email from DE to GM re Synergy vendor app - SCSRELATIVITY 0001354010-13
243		7/25/20		2021.03.10 Email from PB to AB fw t3 verification issue - SCSRELATIVITY 0001350917-19
244				<i>Intentionally Left Blank</i>
245		9/25		2021.03.17 Email CB to MR and AD re Safe Chain Response to Gilead Email - DOJ-PPM-0000119910-11
246				2021.03.17 Email CB to PB, AB re final check Safe Chain Response to Gilead Email - SCSRELATIVITY 0001339466-67

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
247		10/6		2021.03.17 Email CB to PB, AB re Safe Chain Response to Gilead Email - SCSRELATIVITY 0001396253-54
248				2021.03.17 Email from Martha Rumore to Charles Boyd & Abbie Divilio RE e-Pharm Alter Notice Illegitimate Biktarvy - DOJ-PPM-0000117254
249		9/18		2021.03.17 Email from Pat Boyd to Antione Brooks et al Response on Gilead PR - SCSRELATIVITY_0001340000-01
250				2021.03.18 Email from DF to AD re draft letter to pilgrim - SCSRELATIVITY 0001338203
251		10/21		2021.03.23 Email from Charles Boyd to compliance FW [Testing] e-Pharm Alert Patient Safety - SCSRELATIVITY 0001374672
252		10/21		2021.03.24 Email from CB to PB AB fwd Gilead sciences - DOJ-PPM-0000120004-05
253				2021.03.26 Email from Abbie Divilio to Charles Boyd et al RE Timeline - DOJ-PPM-0000116664-810
254				2021.03.26 Email from CB to AD fwd wrong meds inside - SCSRELATIVITY 0001350506-09
255				2021.03.29 Email from Anthony Berger to Frier Levitt re Draft letter to Gilead - DOJ-PPM-0000116864-65
256				2021.03.30 Email AD to CB re BLVD T3s false - SCSRELATIVITY 0001333932
257				2021.03.30 Email from Frier Levitt to CB, AD, et al fwd Gilead response to March 29 Letter - DOJ-PPM-0000116487
258				2021.03.30 email from JD to RB re safe chain 2 - supplemental response to Gilead - DOJ-PPM-0000115623
259				2021.03.30 Email from JD to RB safe chain - supplemental response to Gilead - DOJ-PPM-0000116035-40
260				2021.04.01 Email from CB to AD fwd email re pharmacy wrong pill in bottle - SCSRELATIVITY 0001358600
261				2021.04.02 Email from Frier Levitt to Safe Chain re April 1st letter from Gilead - DOJ-PPM-0000116365-66
262				2021.04.05 Email from Abigail Divilio to Charles Boyd re Synergy T3 issues - SCSRELATIVITY 0001341102-05
263				2021.04.05 Email from Charles Boyd to Abigail Divilio re Synergy falsified T3 - SCSRELATIVITY 0001341155
264		9/25/24		2021.04.06 Email from CB to AD re synergy - SCSRELATIVITY 0001341323
265		10/16		2021.04.07 Email from MR to CB AD AB PB meeting follow-up - DOJ-PPM-0000116605

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
266				2021.04.09 Email from AD to CB PB fw sample ped - SCSRELATIVITY 0001335630-31
267				2021.04.09 Email from AD to Picard cc Boyd re distribution of bottles in 3911 - SCSRELATIVITY 0001341291
268		9/25p		2021.04.09 Email PB to CB re AD language - SCSRELATIVITY 0001335630
269		9/25		2021.04.12 Email from CB to Frier Levitt re Synergy - DOJ-PPM-0000116913
270				2021.04.13 Email Divilio to Vega cc CBoyd PBoyd re Synergy issues, Genvoya packets - SCSRELATIVITY 0001322650-61
271				2021.04.13 Email from Charles Boyd to Blair Rosello CB Notes - SCSRELATIVITY 0001365507
272		10/6		2021.04.16 Email Brosius to PB GM re Invicta T3s - SCSRELATIVITY 0001343031-32
273		9/25		2021.04.20 Email from Frier Levitt to CB, AD et al fwd Gilead email to Frier Levitt - DOJ-PPM-0000116042-43
274				2021.04.21 Email from CB to AB, AD re Gilead Safe Chain - DOJ-PPM-0000116194-95
275				2021.04.21 Email from Frier Levitt to CB, AD et al fwd Friar Levitt and Gilead email - DOJ-PPM-0000115480-81
276				2021.04.21 Email from Frier Levitt to CB, AD, et al fwd Gilead comms re lot CDGWZA - DOJ-PPM-0000115606
277		10/6		2021.05.03 Email AB to CB, PB re Legend Drugs complaint - SCSRELATIVITY 0001341780
278		9/19		2021.05.03 Email AB to CB, PB re Trivicay bottle - SCSRELATIVITY 0001539739
279		10/6		2021.05.03 Email GM to CB, PB, and AB re Trivicay (ViiV) - Alzheimer's drugs in bottle - SCSRELATIVITY 0001539767-70
280				2021.05.05 Email from Divilio to Rumore Gilead Subpoena - DOJ-PPM-0000116367-68
281				2021.05.06 Email from Charles Boyd to Lucas Morgan et al RE SafeChain - Draft email to Gilead - DOJ-PPM-0000115493
282				2021.05.07 Email from AD cc CB response to FDA questions - Synergy - SCSRELATIVITY 0001331158-60
282A				2021.05.07 Email from AD cc CB response to FDA questions - Synergy - SCSRELATIVITY 0001331159.xlsx
282B				2021.05.07 Email from AD cc CB response to FDA questions - Synergy - SCSRELATIVITY 0001331161.xlsx

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
282C				2021.05.07 Email from AD cc CB response to FDA questions - Synergy - SCSRELATIVITY 0001331162.xlsx
282D				2021.05.07 Email from AD cc CB response to FDA questions - Synergy - SCSRELATIVITY 0001331163.xlsx
283				2021.05.11 Email from Frier Levitt to CB, AB et al Draft response to Gilead Subpoena - DOJ-PPM-0000116617-18
284				2021.05.11 Email from Frier Levitt to CB, AD et al. re objections to Gilead - DOJ-PPM-0000115633
285				2021.05.14 Email from Frier Levitt to Safe Chain re FR and Gilead call - DOJ-PPM-0000116571
286				2021.05.19 Email from Frier Levitt to CB, AD re sending Gilead 5.19 Email - DOJ-PPM-0000115534
287				2021.05.26 Email from Abbie Divilio SC letter to customers re lots of concern - SCSRELATIVITY 0001349981-82
288				2021.05.26 Email from Lucas Morgan to Charles Boyd et al RE SafeChain - Draft email to Gilead - DOJ-PPM-0000116613
289				2021.05.27 Martha Rumore to Anthony Berger re Safe Chain Follow Up FDA 3911 - DOJ-PPM-0000115868-72
290				2021.06.08 Email from KJ to Invoices re OMOM vendor app - SCSRELATIVITY 0001337074-78
291				2021.06.11 Email from Abigail Divilio to Patrick and Charles Boyd re Omom's non-licensure in Utah - SCSRELATIVITY 0001338028
292				<i>Intentionally Left Blank</i>
293				2021.06.17 Email from Martha Rumore to CB, AD et al. re Demand Letter to Rapids - DOJ-PPM-0000115994-95
294				2021.06.21 Email from compliance to CK re t3 verification - SCSRELATIVITY 0001435132
295			10/6	2021.06.29 Email from AB to CB, PB et al. re May 2021 Financials - SCSRELATIVITY 0001356450-54
295A			10/6	2021.06.29 Email from AB to CB, PB et al. re May 2021 Financials - SCSRELATIVITY_0001356455 Attachment.xlsx
296				2021.07.09 Email from MR to CB FW Safe Chain Solutions Requests for Termination of Notification - DOJ-PPM-0000116404-06
297				2021.07.14 Email from Abigail Divilio to Friar Levitt et al re termination request Oct 13, 2020 3911 - DOJ-PPM-0000116009

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
298				2021.07.14 Email from PB to JW, JN et al re team meeting notes, Synergy and OMOM - SCSRELATIVITY 0001335725
299		10/21		2021.07.21 Email Abigail Divilio to FDA re.3911 Termination - SCSRELATIVITY 0001331103-04
300		10/21		2021.07.26 Email from FDA to Abigail Divilio re termination requests - SCSRELATIVITY 0001402686
301				2021.07.29 Email from Divilio to Frier Levitt (Boyd's CCd) - Gentek Purchases - DOJ-PPM-0000117303
302				2021.07.30 Email from DF to MC re requesting ALL t3s - SCSRELATIVITY 0001434375
303		10/21		2021.03.16 Email Amanda Biggart to Anthony Berger re SDI & SCS 2020 P&L - DOJ-PPM-0000120692
303A		11		2021.03.16 Email Amanda Biggart to Anthony Berger re SDI & SCS 2020 P&L - DOJ-PPM-0000120693
303B		11		2021.03.16 Email Amanda Biggart to Anthony Berger re SDI & SCS 2020 P&L - DOJ-PPM-0000120694
304				2021.08.29 Email from CB to PB, AB and Legal Team re Complaint Notes
304A				2021.08.29 Email from CB to PB, AB and Legal Team Attachment - First Amended Complaint
304B				2021.08.29 Email from CB to PB, AB and Legal Team Attachment - Memorandum of Law
305		9/19		2021.06.11 Email from AD to NY official cc CB PB re BLVD - SCSRELATIVITY 0001332356
305A		9/30		2021.06.11 Email from AD to NY official cc CB PB re BLVD - SCSRELATIVITY 0001332357 Attachment
306				2021.07.28 Email JDresser to CB PB JH re Gilead Purchases - BOYD PRIV 0000000337-41
306A				2021.07.28 Email JDresser to CB PB JH re Gilead Purchases - BOYD PRIV 0000000342
307		10/16		2021.03.19 Email CB to others approving return of damaged labels bottles - WWPB174773
308		10/16		2021.03.19 Email KMiller to exec@safechain.com re VLS return of bottles for damaged labels - SCSRELATIVITY 0001366793-96
309				2020.08.27 Email Kimchi to AD attaching T3s w IPC - SCSRELATIVITY 0001333679-80
310		10/18		2020.10.05 Email King Kimchi to Abigail Divilio and Charles Boyd re lot CDGXKA - SCSRELATIVITY 0001433889-90

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
311				2020.10.05 Email King Kimchi to Abigail Divilio 'some how that been holding it' - SCSRELATIVITY 0001428331
312	9/16 10/21			2021.03.31 Email Garrett Mellott to Abigail Divilio and Charles Boyd re Global Biktarvy - SCSRELATIVITY 0001392205
313	3/19 10/21 3/20 3/28 9/22 2/29 3/24	9/25 9/25 9/25-11/25 9/25 9/25		2021.07.01 Email from Garrett Mellott to AB, CB, PB re prezcobix inside symtuza bottles - pb1 SCSRELATIVITY 0001428331
400	3/33 3/37 9/30 3/37 9/30 3/39 10/16 3/41 10/21	9/25		400s Teams 2/28 10/16 3/41 10/21 3/49 10/21 10/16 3/51 10/21 2021.04.07 Teams Abigail Divilio and Dakota Flowers re false Rapids T3s - RSMF TEAMS 0000010536 10/20
401				2020.04.27 Teams KN and JA re BLVD 3/16 10/20 RSMF TEAMS 0000108087 3/16 10/20
402				2020.05.06 Teams Atkinson to Kenzie re BLVD shady at 3/21 10/21 RSMF Teams 0000108052 10/21 3/23 10/21
403				2020.05.12 Teams Jon Atkinson and Kenzie Nalley re Boulevard - RSMF TEAMS 0000108032 3/21 10/21
404		10/16		2020.05.13 Teams Patrick Boyd and Adam Brosius re 'HIV stuff can be very profitable' - RSMF TEAMS 0000083340 3/29 10/21
405		10/16		2020.05.19 Teams Adam Brosius to Boyd re HIV - RSMF TEAMS 0000083337
406		10/16		2020.05.22 Teams from Adam Brosius to Charles Boyd re 'our numbers are gonna be 1 mil+' - RSMF TEAMS 0000076555
407				2020.05.27 Teams Abigail Divilio and Jon Atkinson re BLVD email on customer orders - RSMF TEAMS 0000125879
408		10/16		2020.05.29 Teams CB KN re BLVD app sketchy - RSMF TEAMS 0000059471
409				2020.06.02 Teams Abbie Divilio and Jesse Hammett re BLVD Issues - RSMF TEAMS 0000106219
410		10/16		2020.07.08 Teams Patrick Boyd and Tyler Tedrow re obnoxious the way it comes in - RSMF TEAMS 0000083013
411				2020.07.08 Teams with Nicholls and Brooks re '7 percent with a pedigree but can do 9 percent off without' - RSMF TEAMS 0000074314
412		10/16		2020.07.16 Teams Patrick Boyd and Adam Brosius re Brosius Indictment - RSMF TEAMS 0000083290
413				2020.07.17 Teams JN and ML re 'customers told me they don't care about VAWD or Pedigree' - RSMF TEAMS 0000043118

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414		10/6		2020.07.17 Teams Michael Landy to Pat Boyd re does Boulevard come in 'sealed' bottles - RSMF TEAMS 0000049795
415				2020.07.20 Teams AD KJ re Boulevard not sending T3s - RSMF TEAMS 0000104706
416				2020.07.27 Teams Jonathan Nicholls and Jon Weed re 'guy in CA does 500k of HIV shit a month' - RSMF TEAMS 0000066593
417				2020.07.29 Teams Jonathan Nicholls and Jon Weed re '110K order of HIV to start the day' - RSMF TEAMS 0000066589
418		9/19		2020.08.17 Teams Charles Boyd, Abbie Divilio, and Jesse Hammett re WC issues - RSMF TEAMS 0000007332-33
419				2020.08.27 Teams Abigail Divilio and Jon Atkinson re King Kimchi 'spammy-ass looking email' - RSMF TEAMS 0000125797
420		9/18		2020.08.31 Teams Patrick Boyd and team re buying from BLVD again - RSMF TEAMS 0000031443
421		9/19		2020.09.01 Teams from Abigail Divilio to Patrick Boyd re 'I would prefer he not just make something up' - RSMF TEAMS 0000074579
422		10/6		2020.09.09 Teams Charles Boyd, Patrick Boyd, and Jesse Hammett re "Travis-Amanda plan" - RSMF TEAMS 0000084207
423				2020.09.09 Teams Jonathan Nicholls and Jon Weed re shipping without pedigrees - RSMF TEAMS 0000066556
424				2020.09.10 Teams Patrick Boyd and Charles Boyd re customers about to return due to no t3s - RSMF TEAMS 0000053280
425		9/19		2020.09.10 Teams PB AD re no T3s for Olympia order - RSMF TEAMS 0000074578
426				<i>Intentionally Left Blank</i>
427		10/6		2020.09.11 Teams Charles Boyd and Adam Brosius re 'love the HIV' - RSMF TEAMS 0000076439
428				2020.09.24 Teams Jonathan Nicholls and Jon Weed re bottles from BLVD - RSMF TEAMS 0000066546-47
429		9/19		2020.09.24 Teams Patrick Boyd and Abigail Divilio re it's a boulevard issue - RSMF TEAMS 0000074574
430		9/25		2020.09.25 Teams CB & GM re Bay Pharmacy Issue with Blvd Product - RSMF TEAMS 0000051859
431		9/18		2020.09.25 Teams PB to reps reprioritize Blvd HIV products - RSMF TEAMS 0000031518

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
432		10/6		2020.09.29 Teams Adam Brosius and Charles Boyd re Peter at BLVD looking for money - RSMF TEAMS 0000076429
433				2020.09.29 Teams Charles Boyd and Patrick Boyd re Queens Eagle Article - A RSMF TEAMS 0000053268
433A				2020.09.29 Teams Charles Boyd and Patrick Boyd re Queens Eagle Article - Queens Eagle Article
434				2020.10.01 Teams Abigail Divilio and Dakota Flowers re Queens Eagle Article - A RSMF TEAMS 0000011733
434A				2020.10.01 Teams Abigail Divilio and Dakota Flowers re Queens Eagle Article - Queens Eagle Article
435		9/19		2020.10.01 Teams CB to AD re BLVD t3s verify asap - attachment of instacare - RSMF TEAMS 0000061708-09
436	A	9/19		2020.10.02 Teams AD BRosiello Blvd not legit docs - RSMF TEAMS 0000066114
437		9/19		2020.10.02 Teams AD to CB re call with Peter Khaimov - RSMF TEAMS 0000061707
438		9/18p		2020.10.02 Teams Charles Boyd, Patrick Boyd, and Jesse Hammett re T3 from Blvd - RSMF TEAMS 0000085781
439		9/18		2020.10.03 Teams Patrick Boyd and Jonathan Nicholls re pedigree hiccups - RSMF TEAMS 0000054204
440		9/19		2020.10.05 Teams AD to CB re not possible to buy from Instacare can't reach Rochester - RSMF TEAMS 0000061706
441				2020.10.05 Teams from Jonathan Nicholls to Meg Gorman they were on my case about pedigrees - RSMF TEAMS 0000039098
442				2020.10.06 Teams Charles Boyd and Garrett Mellot re Open bottle Blvd Harvoni - RSMF TEAMS 0000051855
443				2020.10.21 Teams from Jonathan Nicholls to Jon Weed re BLVD T3s being 'complete bogus' - RSMF TEAMS 0000066532
444				2020.10.30 Teams Adam Brosius, Patrick Boyd, and Charles Boyd re continue the momentum - RSMF TEAMS 0000005871
445		10/6		2020.11.23 Teams Patrick and Charles Boyd, Adam Brosius re 'BLVD is working on larger numbers' - RSMF TEAMS 0000005850
446		10/6		2021.01.15 Teams AB, PB, CB re BLVD probably not licensed - RSMF TEAMS 0000005804
447		10/6		2021.01.27 Teams Chat Patrick Boyd and Marc Smith re Adam and Charlie Using Drop Shippers for HIV Drugs - RSMF TEAMS 0000124908

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
448				2021.03.02 Teams Abigail Divilio and Kelsey Jones re new vendor Synergy 'seems sketchy' - RSMF TEAMS 0000104609
449 <sup>A</sup> <sub>B</sub> <sub>C</sub>		10/21 11 2		2021.03.10 Teams Abigail Divilio and Dakota Flowers re 'at lease we have proof this is a no no from the start - RSMF TEAMS 0000011562
450				2021.03.11 Teams Adam Brosius, Patrick Boyd, and Garrett Mellott re Synergy - RSMF TEAMS 0000006955
451				2021.03.22 Teams Charles Boyd, Patrick Boyd, and Anthony Berger re bank no more LOC while Brosius under indictment - RSMF TEAMS 0000012159
452				2021.04.07 Teams Abigail Divilio and Dakota Flowers re Rapids T3 being inconsistent - RSMF TEAMS 0000011536
453				2021.04.09 Teams Abigail Divilio and Dakota Flowers re vendors being 'sketchy' - RSMF TEAMS 0000011532
454				2021.04.15 Teams GM AD re Cintex Jeff run around T3s - RSMF TEAMS 0000013384
455				2021.04.26 Teams Adam Brosius, Patrick Boyd, Charles Boyd and Garrett Mellott re Synergy inventory - A RSMF TEAMS 0000003448
445A				2021.04.26 Teams Adam Brosius, Patrick Boyd, Charles Boyd and Garrett Mellott re Synergy inventory - DOJ Article Link
456				2021.04.28 Teams Adam Brosius, Patrick Boyd, and Charles Boyd re Fake Blvd Product - RSMF TEAMS 0000003445
457				2021.05.04 Teams Adam Brosius, Patrick Boyd, Garrett Mellott re Synergy product RSMF TEAMS 0000006930
458		10/6		2021.05.12 Teams AB, PB, CB and GM re Synergy inventory and BLVD cash - RSMF TEAMS 0000003424
459				2021.05.25 Teams Abigail Divilio and Jon Atkinson re 'we are associated with some real scummies' - RSMF TEAMS 0000125560
460				2021.06.10 Teams Abigail Divilio and Kelsey Jones re red flags - RSMF TEAMS 0000104576
461		9/19		2021.06.11 Teams Charles Boyd and Abigail Divilio re Utah BOP proposed sale - RSMF TEAMS 0000061584
462				2020.10.28 Teams CB JNicholls re Claytons and VAWD - RSMF TEAMS 000002385
463		9/28/24		2021.04.07 Teams Charles Boyd, Adam Brosius, and Patrick Boyd re Synergy PR Distributor - SCSRELATIVITY 0001147189

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
464				2020.08.17 Teams Divilio to PB re calling Drogueria Betances w nbr - SCSRELATIVITY 0000975751
465				2021.06.16 Teams AD HD repeated concerns to execs over and over - RSMF TEAMS 0000035958-60
466				2020.10.02 Teams AD to CB re call with Peter - RSMF TEAMS 0000061707
467				2020.10.02 Teams AD To CB re call with Peter and no paperwork - SCSRELATIVITY 0000936714
468				2020.10.02 Teams CB response to AD - SCSRELATIVITY 0000886193
471	9/19		500s Phone Communications	472 9/19 473 10/16 474 10/21 475 10/21 476 10/21 477 10/21 478 10/21 479 10/21 480 10/21 481 10/21 482 10/21 483 10/21 484 10/21 485 10/21 486 10/21 487 10/21 488 10/21 489 10/21 490 10/21 491 10/21 492 10/21 493 10/21 494 10/21 495 10/21 496 10/21 497 10/21 498 10/21 499 10/21 500 10/21
500				2020.07.27-2021.01.26 Charles Boyd and Edelweiss Texts
501	9/25P			2020.07.29-2021.05.17 Charles Boyd and Garret Mellot Texts
502				2020.07.29-2021.06.11 Charles Boyd and Samuel Texts
503	9/25P			2020.08.10-2021.03.30 Charles Boyd and Peter Texts
504				2020.08.26-2021.07.26 Charles Boyd and Amanda Divilio Texts
505	9/25P			2020.09.29-2020.10.13 Charles Boyd, Peter Boyd, and Adam Brosius Texts
506				2020.04.09 Text PB, HD, PB re Synergy no MD license - SCSRELATIVITY 0001588108
507	9/16			2020.07.13 Text Pat Boyd Amanda Richardson re Brosius indictment - SCSRELATIVITY 0001599829
508				2020.07.14 Text CB, PB, and TB re Brosius indictment - SCSRELATIVITY 0001600976
509	10/16			2020.08.11 Text Patrick Boyd and Amanda Richardson re 'got pissed about pedigree' - SCSRELATIVITY 0001632512
510				2020.08.12 Text Boyds and Berger re bank and Adam situation - SCSRELATIVITY 0001619861
511				2020.08.14 Text Garret Mellot and Charles Boyd re bipolar med in bottle - SCSRELATIVITY 0001557510
512				2020.08.14 Text Garrett Mellott and Charles Boyd re White Cross - SCSRELATIVITY 0001557515
513				2020.08.14 Text Patrick Boyd and Charles Boyd re 'different med' - SCSRELATIVITY 0001557545
514	9/19			2020.08.17 Text CB, AD, & JH images of pill bottle with wrong meds - SCSRELATIVITY 0001559029-033
515				Intentionally Left Blank
516	9/19			2020.08.26 Text CB AD re BLVD T3 - SCSRELATIVITY 0001554000-01

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
517		9/18		2020.09.14 Text CB, PB, and JN re delayed pedigrees - SCSRELATIVITY 0001558255-57
518				2020.09.28 Text JH to PB & CB re differences in bottles - MREV-0000048880
519				2020.09.29 Text TT PB re received open bottle - SCSRELATIVITY 0001624740
520				2020.10.06 Text CB AB Dhruv Edel still won't talk getting weird - SCSRELATIVITY 0001553914-15
521				2020.10.26 Text CB and JH re FDA Notice on Verification Requirements - MREV-0000061248
522				2020.12.23 Text JH & CB discuss Blvd product & bad T3 Not following normal process - MREV-0000059739
523				2020.12.28 Text CB, PB, ER, AB, DR re 800k payment - SCSRELATIVITY 0001553689
524		10/16		2021.01.25 Text Patrick Boyd and Nicole Sawyer re 'I'd just send it and pray' - SCSRELATIVITY 0001588548
525				2021.03.17 Text JW PB re Gilead pretty serious Gentek - SCSRELATIVITY 0001609745
526				2021.03.31 Text Abigail Divilio and Dakota Flowers re forged document - SCSRELATIVITY 0001576191-92
527		10/16		2021.04.08 Text PB JW news on HIV suppliers - SCSRELATIVITY 0001586459
528				2021.04.16 Text PB, AB, Jeff re T3 don't want to return - SCSRELATIVITY 0001582812
529		10/16		2021.05.13 Text AB PB re wouldn't report them... regardless - SCSRELATIVITY 0001615524
530				2021.05.26 Text KF and others re Synergy and T3s - MREV-0000078664
531				2021.07.30 Text PR & PB Discuss Gilead - 3MREV-0000045384
532				2021.10.14 Text PR tells AR 'F'n SafeChain is still selling HIV' - SCSRELATIVITY 0001649359
533		9/19		2020.07.24 Facebook Message CB to LTrissell re HIV - CharlesBoyd 0000032693
534				2020.09.30 Text Adam Brosius, Charles Boyd, and Peter BLVD re call - SCSRELATIVITY 0001555891
535		10/16		2020.10.06 Text Adam Brosius and Charles Boyd re call with Peter - SCSRELATIVITY 0001555159
536				2020.08.25 Text Adam Brosius to Dhruv Ralhan re call with Charles Boyd and Peter Boulevard - BrosiusPHONE 0000022686

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Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
<b>600s Miscellaneous</b>				
600		9/18		2015.05.02 SOP for Suspect & Illegitimate Product - SCSRELATIVITY 0001331049
601		9/18		2015.05.09 Safe Chain SOP for Product Tracing - SCSRELATIVITY 0001320811
602		9/18		2015.05.09 Safe Chain SOP for Vendor and Transaction History Authentication - SCSRELATIVITY 0001331052
603		9/18		2017.06.05 Letter from C. Boyd to NABP re VAWD Accreditation Failure - DOJ-PPM-0000115843
604		9/18		2018.01.08 Safe Chain SOPs for Returned, Outdated, and Damaged Product - SCSRELATIVITY 0001331046
605		9/18		2018.01.09 Safe Chain SOPs for Trading Partner Validation - SCSRELATIVITY 0001331051
606				2019.12.01 Safe Chain Compliance SOPs - SCSRELATIVITY 0001322494
607				2020.01.01 Safe Chain SOPs for Trading Partner Validation - SCSRELATIVITY 0001331124
608				2020.05 Univest Bank Account x9807 - Safe Chain Solutions May 2020 Statements - SCS-0000143862
609				2020.05.20 Kalorama Safe Chain Application - SCSRELATIVITY 0002130584
610				2020.06.08 Charles Boyd One Note Mtg Notes - large number of T3 requests - DOJ-PPM-0000119962
611				2020.07.02 Executed Agreement Safe Chain LLC and Legacy Pharmacy Group - SCSRELATIVITY 0001361089
612		10/6		2020.08.03 Charles Boyd One Note Mtg Notes - historic revenue and BLVD peds to start - DOJ-PPM-0000119962
613		10/6		2020.08.10 Charles Boyd One Note Mtg Notes - HIV saved us and Peter - Borat to provide peds - DOJ-PPM-0000119962
614				2020.08.31 Letter from Safe Chain to Customers re Legacy discount - SCSRELATIVITY 0001409358
615				2020.09.02 Return Authorization 01S30049 of Prezista from Kalorama - CTRL02266320
616				2020.09.11 Invoice 01I32805 to Olympia Plaza Pharmacy - SCSRELATIVITY 0001396904
617		10/6		2020.10.13 FDA Form 3911 - SCSRELATIVITY 0002184841
618				2020.12.07 Frier Levitt Response to Gilead Nov 23 Letter to Safe Chain - DOJ-PPM-0000115538
619				2021.02.10 Safe Chain White Cross T3 Attachment - SCSRELATIVITY 0001322773

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
620				2021.03.15 Safe Chain SOPs for Reporting to Agencies - SCSRELATIVITY 0001329101
621		10/6		2021.03.15 Safe Chain SOPs for Suspect and Illegitimate Product - SCSRELATIVITY 0001329105
622				2021.03.15 Safe Chain SOPs for Trading Partner Validation - SCSRELATIVITY 0001329107
623		10/6		2021.03.15 Safe Chain SOPs for Vendor and Transaction History Authentication - SCSRELATIVITY 0001329108
624				2021.03.15 Safe Chian SOPs for Product Inventory - SCSRELATIVITY 0001329580
625				2021.03.18 Legend invoice for Biktaryv bottle containing Seroquel - DOJ-PPM-0000115608
626				2021.03.26 Safe chain response to Gilead letter - DOJ-PPM-0000115903
627				2021.03.29 Safe Chain Letter to Gilead RE Quarantine - DOJ-PPM-0000116040
628				2021.04.29 Frier Demand Letter to BLVD - DOJ-PPM-0000115215
629				2021.05.27 Letter from Friar Levitt to Christina Picard re FDA 3911-45802703 and 45629496 - DOJ-PPM-0000115869
630		10/6		2021.06.21 Meeting Notes re OMOM - SCSRELATIVITY 0002182808
631		9/19		2024.04.22 Gustavo Borja Interview Attachments - Photos of pills and email communications - SCS-0000125833-50
632				Borja, Gustavo Patient Files - SCS-0000138525-64
633				CA BOP Investigative File - SCS-0000144764
634				Compiled 3911 forms sent to FDA - SCS-0000136263
634A		10/21		Compiled 3911 forms sent by Safe Chain to FDA - SCS-0000136263
634B				Compiled 3911 forms sent by Others to FDA - SCS-0000144697
635				Documents provided by William Fadel - SCS-0000138844
636				Pilgrim Pharmacy Records - SCS-0000091194
637				Safe Chain Summary of Incidents - SCSRELATIVITY 0002181134
638				Charles Boyd Car Accident Documents
639		9/19		Photographs of Boulevard 9229 LLC
640		9/19		Photographs of Gentek LLC
641		9/25		Underlying Data for Call Records Summary Exhibit - Verizon Tolls
642				FDA 2022 Inspection Exhibit CMP-8 - SCS-0000153390

Exhibit Number	Date Identified	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
643				SOP - Vendor & Transaction History Authentication - SCSFDA 0000002897
644				Safe Chain Patient Health Photo
645		10/6		Patrick Boyd Deposition Exhibit 6 - SCS-0000133476
646		10/6		Patrick Boyd Deposition Exhibit 7 - SCS-0000133477
647				Blank T3 Paperwork - SCSRELATIVITY 0001416053
648				Highlighted T3 Paperwork - SCSRELATIVITY 0001409644
649				Peter Khaim Text Screenshot to Adam Brosius - SCSRELATIVITY 0001415195
650				FedEx Shipments from Safe Chain
650A				FedEx Certification of Records
651		9/19		Photo of Financials
652		9/30		Intentionally Left Blank
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Respectfully submitted,

JASON A. REDING QUIÑONES  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF FLORIDA

LORINDA LARYEA, ACTING CHIEF  
U.S. DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION, FRAUD SECTION

Dated: September 16, 2025

By: /s/ Alexander Thor Pogozelski  
Alexander Thor Pogozelski  
Florida Special Bar No. A5502549

Assistant United States Attorney  
99 Northeast 4th Street  
Miami, Florida 33132  
Tel: (786) 649-5251  
Email: [Alexander.Pogozelski@usdoj.gov](mailto:Alexander.Pogozelski@usdoj.gov)

/s/ Jacqueline Zee DerOvanesian  
Jacqueline Zee DerOvanesian  
Trial Attorney  
Florida Bar No. 125662  
United States Department of Justice  
Criminal Division, Fraud Section  
1400 New York Avenue NW  
Washington, D.C. 20005  
Tel: (202) 285-9285  
Email: [Jacqueline.DerOvanesian@usdoj.gov](mailto:Jacqueline.DerOvanesian@usdoj.gov)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 16, 2025, a true and correct copy of the foregoing was filed and served on all counsel of record via the CM/ECF system.

**Dated:** September 16, 2025

/s/ Alexander Thor Pogozelski  
Assistant United States Attorney